



**OPEX Corporation (“OPEX,” the “Company,” “we,” “our,” or “us”)
Human Resources Privacy Notice – California**

VERSION 1.1; EFFECTIVE 30 DECEMBER 2024

PURPOSE OF THIS NOTICE: This Human Resources Privacy Notice (“**Notice**”) describes our collection and use of certain personal information relating to our employees and applicants or candidates for employment with us, in each case, who are California residents (“**CA Residents**”). This notice is intended to satisfy our obligation under the California Consumer Privacy Act (the “**CCPA**”) to provide notice to CA Residents concerning the personal information we collect about them. Under the CCPA, “personal information” is any information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular California resident or household.

SCOPE OF THIS NOTICE: This Notice applies to the following personal information that we collect relating to CA Residents:

- Personal information about CA Residents that we collect and use in the context of their working relationship or application with OPEX;
- Emergency contact information for such CA Residents that we collect and use for emergency contact purposes;
- Other personal information that we collect to administer benefits that the Company makes available to CA Residents.

NOT COVERED IN THIS NOTICE: This Notice does not address or apply to our collection, use, or disclosure of any of the following information about CA Residents:

- Protected health information, subject to HIPAA or the California Medical Information Act (please refer to the OPEX Policy Manual to learn how we handle protected health information);
- If applicable, consumer report information that is subject to the Fair Credit Reporting Act (the “**FCRA**”), or that we disclose to obtain a consumer report under the FCRA;
- Publicly available data that is lawfully made available from federal or state government records;
- Other personal information that is exempt from the CCPA.

CATEGORIES OF PERSONAL INFORMATION COLLECTED: We collect the following categories of personal information (as set forth in the CCPA) about CA Residents, in the context of managing their working relationship or job application with us:

- **Name, Contact Info, and Other Identifiers:** identifiers such as a real name, alias, postal address, unique personal identifier, Internet Protocol address when logging into the Company’s systems, personal email address, social security number, driver’s license number, passport number, or other similar identifiers.



- **Protected Classifications:** characteristics of protected classifications under California or federal law such as race, color, sex, age, national origin, disability, and citizenship status.
- **Usage Data:** Internet or other electronic network activity information over Company-owned and/or -provided systems or devices, including, but not limited to, browsing history, search history, and information regarding a CA Resident's interaction with an Internet website, application, or advertisement.
- **Geolocation Data:** precise geographic location information about a CA Resident or device.
- **Audio/Visual Data:** audio, electronic, visual, or similar information such as when we include your photo in your professional profile in Company systems such as Microsoft Outlook, in other corporate communications systems, directories, in newsletters accessible to employees of the OPEX group of companies worldwide, or in our external promotional materials distributed outside of the OPEX group of companies.
- **Employment History:** professional or employment-related information, including, without limitation, when we include your current job title and contact information in systems such as Microsoft Outlook and/or in other corporate communications systems or directories accessible to employees of the OPEX Group of companies worldwide.
- **Education Information:** information about education history or background that is not publicly available personally identifiable information as defined in the federal Family Educational Rights and Privacy Act (20 U.S.C. section 1232g, 34 C.F.R. Part 99).
- **Profiles and Inferences:** inferences drawn from any of the information identified above to create a profile about a resident reflecting the resident's preferences, characteristics, workplace behavior, abilities, and aptitudes.

PURPOSES FOR COLLECTING AND USING PERSONAL INFORMATION: We use the above categories of personal information for the following purposes:

- **Compensation and Benefits Administration.** Administration of compensation and benefits, including:
 - Administering employee payroll, salary, and compensation
 - Calculating deductions, issuing tax return-related documents and forms
 - Administering pensions, IRAs and 401K, health insurance, medical plans, and other benefits (which may include the collection of personal information about others such as beneficiaries, where necessary to administer such benefits)
 - Monitoring and managing PTO, holidays, FMLA, and other leaves of absence
 - Reviewing, assessing and administering salary and compensation increases and bonuses
- **Management of Working Relationship.** For the purpose of:
 - Making hiring and promotion decisions, taking disciplinary actions and terminating employees
 - Conducting performance, compensation and bonus reviews
 - Conducting headcount and salary reviews
 - Administering and monitoring compliance with Company policies and procedures

- Maintaining records of emergency contact information for use in the event of an emergency
- Administering or performing employment contracts if applicable
- Conducting pre-employment and employment screening
- Professional development and training purposes
- Verification and management of credentials, licensing and other qualifications related to roles and responsibilities of CA Residents
- Facilitating employee communication and collaboration, such as through the corporate directory, employee bios, and other similar communications
- Our equal opportunity employment policy and diversity and inclusion program
- **Management of Job Applications, Recruiting, and Hiring.** To review, assess, recruit, consider or otherwise manage applicants for employment or contractor positions, including:
 - Scheduling and conducting interviews
 - Identifying candidates, including by working with external recruiters
 - Reviewing, assessing and verifying information provided, conducting criminal and background checks, and otherwise screening or evaluating applicants' qualifications, suitability and relevant characteristics
 - Satisfying legal and regulatory obligations
 - Communicating with applicants regarding their applications and about other similar position(s) in which they may be interested
 - Maintaining applicant personal information for future consideration
 - In support of our equal opportunity employment policy and practices
- **Conducting Business and Management of Customer Relationships.** The organization and operation of our business, including:
 - Operating our business and the business of other OPEX group companies by developing, producing, marketing, selling and providing products and services
 - Providing information technology ("IT") and information processing support and IT applications and systems maintenance
 - Providing after-sales service to customers
 - Embossing the manuals that our technicians provide to our customers with the technician's name and employee identification number
 - Auditing and assessing the performance of business operations, including after-sales service and associated activities
 - Training and quality control
 - Satisfying customer reporting and auditing obligations if any
 - Facilitating business development opportunities, as relevant
 - Facilitating communications in furtherance of the foregoing
- **Security and Monitoring.** To monitor and secure our resources, network, premises, and assets, including:
 - Monitoring for, preventing and investigating suspected or alleged misconduct or violations of workplace rules
 - Monitoring for, preventing investigating, and responding to security and privacy incidents
 - Providing and managing access to physical and technical access controls



- Monitoring activities, access, and use to ensure the security and functioning of our systems and assets
- Securing our offices, premises and physical assets, including through the use of electronic access systems and premises video monitoring
- ***Auditing, Reporting Corporate Governance, and Internal Operations.*** Relating to financial, tax, and accounting audits, and audits and assessments of our business operations, security controls, financial controls, or compliance with legal obligations, and for other internal business purposes such as administration of our records retention program.
- ***M&A and Other Business Transactions.*** For purposes of planning, due diligence, and implementation of commercial transactions, for example, mergers, acquisitions, asset sales or transfers, bankruptcy or reorganization, or other similar business transactions, if any.
- ***Defending and Protecting Rights.*** To protect and defend our rights and interests and those of third parties, including to manage and respond to employee and other legal disputes, to respond to legal claims or disputes, and to otherwise establish, defend or protect our rights or interests, or the rights, interests, health or safety of others, including in the context of anticipated or actual litigation with third parties.
- ***Compliance with Applicable Legal Obligations.*** Relating to compliance with applicable legal obligations (such as hiring eligibility, responding to subpoenas and court orders) as well as assessments, reviews and reporting relating to such legal obligations, including under employment and labor laws and regulations, social security and tax laws, environmental regulations, workplace safety laws and regulations, and other applicable laws, regulations, opinions and guidance.

CHANGES TO OUR PRIVACY NOTICE: We reserve the right to amend this Notice at our discretion and at any time. When we make changes to this privacy notice, we will notify you by email or through an updated notice on our website.

CONTACTING US ABOUT THIS NOTICE: If you have any questions or concerns regarding our use of personal information as described in this Notice, please contact Jeff Stoner in the OPEX Human Resources Department, who may be reached at jstoner@opex.com or +1 856-727-1100.